

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : **CHAPTER 13**
James A. Jones :
Debtor : **BANKRUPTCY NO.: 20-11460-AMC**

RESPONSE TO MOTION FOR RELIEF

Debtor, by his attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Motion, respectfully represents the following:

1. Admitted.
2. Admitted.
3. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied.
4. Denied. To the extent Movant's averment is a conclusion of law, no response is required. Said averment is therefore denied. To the extent movant's averment avers facts, either directly or by implications, said facts are denied.
5. Denied. The debtor is without the requisite knowledge to admit or deny the Movant's averment. Thus, said averment is denied.
6. Admitted.
7. Should any arrears be due at this time, Debtor intends to cure via loss mitigation options available to him.
8. Movant's averment does not call for a response. Debtor denies the veracity of Exhibit A.
9. Denied. Movant refers to documents on record before the Court. Said documents speak for themselves. The Debtor does not attest to the veracity of said documents, and therefore the averments referencing said documents in the corresponding paragraph are denied. To the extent Movant's averment is a conclusion of law, no response is required.
10. Denied. To the extent Movant's averment is a conclusion of law, no response is required.

11. Movant's averment does not call for a response.

12. Denied. Movant's averment is a conclusion of law, no response is required. . To the extent movant's averment avers facts, either directly or by implications, said facts are denied.

13. Denied. Movant's averment is a conclusion of law, no response is required.

14. Denied. No cause for said relief exists.

WHEREFORE, Debtor prays that the Movant's request for relief be denied.

Date: March 14, 2022

/s/ Brandon J. Perloff
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